

EX PARTE OR LATE FILED

WILEY, REIN & FIELDING

1776 K STREET, N.W.  
WASHINGTON, D. C. 20006  
(202) 429-7000

JEFFREY S. LINDER  
(202) 429-7384

FACSIMILE  
(202) 429-7049  
TELEX 248349 WYRN UR

January 20, 1995

William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

DOCKET FILE COPY ORIGINAL

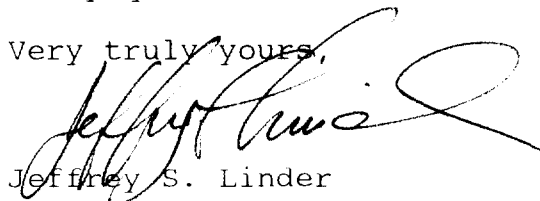
Re: Ex Parte Contact in Docket No. 94-102

Dear Mr. Caton:

I am enclosing two copies of a summary of the opening comments in CC Docket No. 94-102 to be placed in the record. This summary was delivered today to Linda Dubroff of the Common Carrier Bureau and John Reed of the Office of Engineering and Technology.

Please call me if you have any questions.

Very truly yours,



Jeffrey S. Linder

JSL:rw

cc: Linda Dubroff (w/o)  
John Reed (w/o)

No. of Copies rec'd 1  
List A B C D E

**SUMMARY OF  
OPENING COMMENTS IN  
CC DOCKET NO. 94-102  
E911 COMPATIBILITY**

RECEIVED  
JAN 21 1995  
U.S. DEPARTMENT OF JUSTICE  
FEDERAL BUREAU OF INVESTIGATION

DOCKET FILE COPY ORIGINAL

WILEY, REIN & FIELDING  
1776 K Street, N.W.  
Washington, D.C. 20006  
(202) 429-7000

January 20, 1995

## FORWARD

On January 9, 1995, approximately 69 comments were filed in response to the FCC's Notice of Proposed Rulemaking in CC Docket No. 94-102 concerning compatibility with enhanced 911 (E911) systems. Specifically, the Notice seeks comment on numerous proposals regarding compatibility of Multi-Line Telephone Systems and wireless services with E911 capabilities. The comments are arranged alphabetically by company or organization name.

We have done our best to represent each commenter's positions accurately on a range of issues within five pages and in a consistent format. Due to the complexity of the issues and space and time constraints, however, many supporting arguments have been truncated and rephrased to conserve space. Accordingly, in all cases, it is highly advisable to review the actual commenter's text. All summaries have page references to the actual commenter's text.

## TABLE OF CONTENTS

	<u>Page</u>
AD HOC TELECOMMUNICATIONS USERS COMMITTEE, CALIFORNIA BANKERS CLEARING HOUSE, NEW YORK CLEARING HOUSE ASSOCIATION . . . . .	1
ALLTEL MOBILE COMMUNICATIONS, INC. . . . .	4
AMERITECH . . . . .	6
AMSC SUBSIDIARY CORPORATION . . . . .	8
ANACORTES POLICE DEPARTMENT . . . . .	9
ASSOCIATION OF PUBLIC-SAFETY COMMUNICATIONS OFFICIALS-INTERNATIONAL, INC. (APCO), NATIONAL EMERGENCY NUMBER ASSOCIATION (NENA) & NATIONAL ASSOCIATION OF STATE NINE ONE ONE ADMINISTRATORS (NASNA) . . . . .	10
AT&T CORP. . . . .	16
BELL ATLANTIC . . . . .	23
BELLSOUTH, BELLSOUTH TELECOMMUNICATIONS, BELLSOUTH ENTERPRISES & BELLSOUTH CELLULAR . . . . .	26
BEXAR METRO 9-1-1 NETWORK DISTRICT . . . . .	30
C.J. DRISCOLL & ASSOCIATES . . . . .	31
CADDO PARISH COMMUNICATIONS DISTRICT NUMBER ONE . . . . .	32
THE CELLULAR TELECOMMUNICATIONS INDUSTRY ASSOCIATION . . . . .	33
COMSAT CORPORATION . . . . .	38
CONSTELLATION COMMUNICATIONS INC. . . . .	39
CONSUMERS FIRST AND THE AD HOC ALLIANCE FOR PUBLIC ACCESS TO 911 . . . . .	40
COWLITZ COUNTY TECHNICAL SERVICES CENTER . . . . .	41
E.F. JOHNSON CO. . . . .	42

	<u>Page</u>
ELERT & ASSOCIATES . . . . .	43
ERICSSON CORPORATION . . . . .	46
GE CAPITAL-RESCOM . . . . .	48
GEOTEK COMMUNICATIONS, INC. . . . .	50
GREATER HARRIS COUNTY 9-1-1 EMERGENCY NETWORK . . . . .	51
GTE SERVICE CORP. (GTE) . . . . .	52
THE ILLINOIS TELEPHONE ASS'N . . . . .	56
INTERAGENCY COMMITTEE ON SEARCH AND RESCUE (ICSAR) . . . . .	57
INTERNATIONAL COMMUNICATIONS ASS'N (ICA) . . . . .	60
KENTUCKY EMERGENCY NUMBER ASSOCIATION . . . . .	61
KING COUNTY ENHANCED 911 SYSTEM . . . . .	62
MCI TELECOMMUNICATIONS CORP. (MCI) . . . . .	63
MOTOROLA, INC. . . . .	64
NATIONAL ASS'N OF REGULATORY UTILITY COMMISSIONERS (NARUC) . . . . .	69
NATIONAL CELLULAR SAFETALK CENTER, INC. . . . .	70
NATIONAL EMERGENCY NUMBER ASSOCIATION, GEORGIA CHAPTER . . . . .	71
NEXTEL COMMUNICATIONS, INC. . . . .	73
NORTH AMERICAN TELECOMMUNICATIONS ASSOCIATION . . . . .	76
NORTH CAROLINA CHAPTER OF THE NATIONAL EMERGENCY NUMBER ASSOCIATION (NENA) . . . . .	81
NORTHERN TELECOM, INC. (NORTHERN) . . . . .	82
THE NYNEX COMPANIES . . . . .	87

OFFICE OF EMERGENCY TELECOMMUNICATIONS SERVICES DIVISION OF STATE POLICE DEPARTMENT OF LAW AND PUBLIC SAFETY STATE OF NEW JERSEY . . . . .	90
OREGON STATE POLICE, EMERGENCY MANAGEMENT DIVISION . . .	93
ORGANIZATION FOR THE PROTECTION AND ADVANCEMENT OF SMALL TELEPHONE COMPANIES (OPASTCO) . . . . .	95
PACIFIC BELL, NEVADA BELL AND PACIFIC BELL MOBILE SERVICES . . . . .	97
PEOPLE OF THE STATE OF CALIFORNIA & THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA (CPUC) . . . . .	100
THE PERSONAL COMMUNICATIONS INDUSTRY ASSOCIATION . . . . .	102
PRO-WEST & ASSOCIATES . . . . .	109
REDCOM LABORATORIES, INC. . . . .	110
RURAL CELLULAR ASSOCIATION . . . . .	118
SBC COMMUNICATIONS & SOUTHWESTERN BELL MOBILE SYSTEMS . . . . .	120
SAN JUAN COUNTY . . . . .	124
THE SECRETARY OF DEFENSE . . . . .	125
SIEMENS ROLM COMMUNICATIONS, INC. . . . .	127
SMITH ADVANCED TECHNOLOGY, INC. (SAT) . . . . .	130
STANFORD TELECOMMUNICATIONS, INC. . . . .	133
STARSYS GLOBAL POSITIONING INC. . . . .	135
STATE OF CALIFORNIA DEPARTMENT OF CORRECTIONS . . . . .	136
STATE OF WASHINGTON . . . . .	137
TELE-COMMUNICATIONS ASSOCIATION . . . . .	138

Page

TELECOMMUNICATIONS FOR THE DEAF, INC. . . . .	140
TELECOMMUNICATIONS INDUSTRY ASSOCIATION . . . . .	141
TELIDENT . . . . .	145
TERRAPIN CORP. . . . .	147
TEXAS ADVISORY COMMISSION ON STATE EMERGENCY COMMUNICATIONS (TX-ACSEC) . . . . .	149
TRW, INC. . . . .	153
U S WEST, INC. . . . .	155
UTC, THE TELECOMMUNICATIONS ASSOCIATION . . . . .	158
THE WASHINGTON AND OREGON TELECOMMUNICATIONS RATEPAYERS ASSOCIATION FOR COST-BASED AND EQUITABLE RATES . . . . .	160
WATERWAY COMMUNICATIONS SYSTEM, INC. (WATERCOM) . . . . .	162
WESTINGHOUSE ELECTRIC CORP. . . . .	163

**AD HOC TELECOMMUNICATIONS USERS COMMITTEE,  
CALIFORNIA BANKERS CLEARING HOUSE,  
NEW YORK CLEARING HOUSE ASSOCIATION**

**Interest:** Represent owners of telephone systems.

**PBX-Related Issues:**

Ability of PBX to pass calling number and location identifier.

- The proposed rules do not recognize the complexity of compiling and maintaining station location data bases. The proposal does not answer key questions about information that the data bases must contain, such as:
  - Must location information be provided for all phones served by a multi-line system?
  - How detailed must such information be -- building? floor? room or workstation number?
  - How must locations be identified if sites are not numbered or identifiable systematically?
  - What format must be used for the information? (4-5)
- Businesses currently use a variety of location identifiers. The FCC should specify what location information would be required in different situations. (5)
- Even standard office environments vary greatly among companies. Many workplace phones are not located in offices or workstations that are numbered or otherwise identifiable by some systematic means. Companies that do identify their offices and workstations may use a variety of numbering schemes. (5-6)

Reach 911 without initial "9".

- This would conflict with existing convention and create confusion. People used to dialing "9-911" would have to learn to dial "911." (7-8)

Ability to use private emergency response personnel.

- Employees of companies who now dial "911" to reach their internal security and/or medical personnel would become confused by having to learn a new number. Internal personnel may be able to respond better than public agencies. (8)



PBX owner's obligation to update LEC.

- Requiring "accurate and timely database maintenance" may be very burdensome. Some companies relocate employees often. For each move, the data base must be changed to reflect the new location identifier. (6-7, 10)

P.01 grade of service.

- The proposed rules would increase the need for DID trunks and numbers. The rules may effectively require that all stations be served by DID trunks. (8-9)
- There are sound reasons for not serving all PBX locations by DID trunks. There are substantial direct costs. There may also be indirect costs, because screening out incoming personal calls can boost employee productivity. (8-9)
- One member company with a 5000-station facility has perhaps one 911 call per quarter, which does not warrant the fifty trunks that the rules would mandate. (9)

**Other:**

Funding

- The FCC should make clear whether telephone system owners must bear the costs of:
  - storing the station location data base
  - converting existing location information into a format usable by public safety agencies
  - developing and implementing security measures to prevent unauthorized access to the data base (10)

Liability

- The FCC should make clear who bears the cost and risk of liability for:
  - ensuring that the information in the data base will be in a form useful to non-company personnel
  - updating the data base whenever a telephone number is assigned to a new location
  - protecting the privacy of the stored information
  - preventing unauthorized access to the data base

- protecting the Customer Proprietary Network Information that the data base represents from unauthorized use (10-11)
- It is unclear whether the FCC proposes to require all telephone system owners to guarantee the on-going accuracy of all location information. If such information is to go through another entity, that entity should bear the risk of inaccuracies resulting from unauthorized access. If the FCC intends to create a standard of care -- and thus create potential legal liability for owners -- it should state so explicitly. (7)

#### Recommendation

- The FCC should establish an Advisory Committee to re-examine the proposed rules, with input from other agencies and businesses. Due to the enormous variety of workplaces with unique operational needs, agencies that regulate workplace safety develop rules on an industry-specific basis. Their efforts may conflict with these proposed rules. (11-13)

**ALLTEL MOBILE COMMUNICATIONS, INC.**

**Interest:** Cellular service provider

**Wireless-Related Issues:**

Other

- Instead of a formal rulemaking, the Commission should establish a broad-based Industry Advisory Board to create an underlying factual record and to further the efforts to address E911 issues. (1)
- The Commission's proposal is premature. The Commission should issue a Notice of Inquiry. (2)
- The Commission accepts that 10% of 911 calls are from cellular subscribers. However, further inquiry is necessary to determine what percentage of 911 calls occur as a result of a calling surge when numerous callers report the same incident. Call flow is a key consideration with broad implications for call prioritization and grade of service issues. (2)
- Additional study of the E911 needs of roamers must be taken into account. The Commission's rules would require cellular subscribers to identify and register with each system along their route or be foreclosed from using their phone for an emergency. Further delineation of the problem is required before the Commission can tailor its rules. (3)
- Much of the technology required to provide E911 capabilities does not exist, such as assigning priority and stage two and three of Automatic Location Identification. (3)
- Provisions must be made for differences in regional requirements for 911 service, the technical capabilities of particular mobile services, and the need to phase in wireless E911 services in a manner which would ensure that no carrier is forced to upgrade its systems before the area wireline or PSAP is capable of transmitting or utilizing the data. (3-4)
- The provision of E911 services entails close coordination among providers, manufacturers, PSAPs and other interested parties. Any response to the Commission's inquiry as to the costs and benefits of imposing E911 requirements would be premature in

the absence of information from the entities other than the carrier. (4)

- The Commission should pursue E911 service by providing the impetus and the forum for industry cooperation. (5-6)

## AMERITECH

**Interest:** Local exchange carrier

### **PBX-Related Issues:**

#### Reach 911 without initial "9"

- Requiring that PBX station users have the ability to reach emergency services by dialing 911 without having to dial any additional digits would require major expenditures. Industry trials of the proposal reveal implementation intricacies and creation of customer confusion. (3-4)

#### Other

- The Commission proposals would involve the Commission in operational decisionmaking at an unprecedented level of detail. Instead, the Commission should specify broad policy objectives and general areas of responsibility for industry participants. (4)

### **Wireless-Related Issues:**

#### Common channel signalling

- Requiring that SS7-based capabilities must be implemented by a specific date would place the Commission in the position of a network planner committing capital investment on behalf of 911 service providers. (3)

#### Other

- The factors involved in deployment of wireless 911 capabilities are complex. (5)
- The mobility afforded by wireless services complicates call routing and response decisions. For example, geographic locations and callback number may be unimportant in cases involving multiple PSAPs, moving "geolocations" and callers who are merely bystanders. (6-7)
- The funding for wireless technology development has not been a publicly-shared societal responsibility. Funding will continue to be a major issue for service providers and emergency response agencies. (7)

- The characteristics of the wireless marketplace make industry-generated solutions desirable. If the Commission were to mandate detailed operational and funding responsibilities, the resulting gridlock would delay availability. (7)
  - The technologies for detailed geographic location are in their infancy. The Commission should defer technology assessment to ongoing industry efforts. (8)
  - There are unique problems involving liability in the wireless context. The Commission should avoid adopting specific rules at this early date. (8)
- In an effort to unify regulatory principles, the responsibilities imposed upon wireless providers should be applied in an evenhanded manner to all CMRS providers. (9)

## AMSC SUBSIDIARY CORPORATION

**Interest:** Domestic Mobile Satellite Service ("MSS") system provider.

### **Wireless-Related Issues:**

#### Scope of requirement (covered and excluded services).

- Recognizes the importance of emergency communications. The AMSC system is expected to provide a tremendous boon to the provision of emergency service in vast areas that are presently unserved by any mobile communications facilities and, in many cases, by any communications facilities whatsoever. (6)
- Has devised an approach to the handling of 911 calls that should provide its subscribers with excellent service in most cases. All subscribers to AMSC's system will be able to access 911 services, including users of TTY-like devices. All 911 calls will be handled by trained professionals who will be able to route 911 calls to the appropriate public service entities in the appropriate jurisdiction. The calls will rarely be blocked even momentarily and the system provides for the transmission of ANI. (6)
- Urges the FCC not to impose the full range of enhanced 911 requirements on AMSC as they are too costly to be justified. The modifications required to comply with the proposed requirements would require several hundred million dollars of changes to AMSC's system design and to the design of the mobile terminals. (6-8)
  - MSS is a new service and these additional costs could severely hamper development of the service and curtail demand. (7)
  - The basic mobile telephone is already relatively expensive without a 25-50 percent increase in cost. (8)
  - Any customer that wants the extra position location capability can acquire it on an individual basis. (8)
  - Modification of the earth station and switch would cost at least \$2 million, including significant modifications to channel unit software, signalling limits, the network access processor and the station logic signalling subsystem. (8)

**ANACORTES POLICE DEPARTMENT**

**Interest:** 911 center operator that dispatches for police, fire and medical aid calls.

**Wireless-Related Issues:**

Provision of location information.

- Strongly supports the APCO/NENA/NASNA position regarding these issues as well as the positions taken at the TIA/PCIA/APCO/NENA/NASNA Joint Experts Meeting. (2)
- The FCC should rule decisively to set the tone that the communications industries need to consider the effects of their designs and products on enhanced E-911 systems throughout the United States. (2)
- The service providers and equipment and system suppliers should be required to work with public safety associations to this end. (2)



**ASSOCIATION OF PUBLIC-SAFETY COMMUNICATIONS OFFICIALS-  
INTERNATIONAL, INC. (APCO), NATIONAL EMERGENCY NUMBER  
ASSOCIATION (NENA) & NATIONAL ASSOCIATION OF STATE NINE ONE  
ONE ADMINISTRATORS (NASNA)**

**Interest:** APCO is a non-profit organization dedicated to the enhancement of public safety communications.

NENA is a non-profit organization dedicated to the implementation of a universal emergency telephone number system.

NASNA is an organization of state officials who implement state emergency telephone number systems.

**PBX-Related Issues:**

General.

- The rules should encompass Centrex-type systems as well as PBXs. (12)
- Federal installations should be subject to these rules. (15)
- State and local officials should be responsible for determining how PBXs and LECs should interconnect. (16-17)
- State and local regulation of the E911/PBX network interface should be preempted except regulations which address the requirement to connect to E911 networks and database administration. (30)
- Any future providers of local telephone service (i.e. dialtone) must be required to provide unfettered access to E911. (24-26)
  - LECs should be required to sell PSAPs E911 equipment despite the limitations of the MFJ. (27)

Ability of PBX to pass calling number and location identifier.

- Opposes the use of pseudo-SNI as shortsighted and ultimately confusing to all concerned entities. Instead favors the use of NANP numbers, which need not be unique to each station, but must only be

precise enough to route rescuers to the correct area of the correct building. (21-22)

Timing of compliance.

- The proposed 18 month implementation period should be adopted. (27)

Reach 911 without dialing "9".

- Because 9-1-1 has become the universal method of dialing for help, all PBXs, Centrexes and electronic key systems should allow no prefix to 911 dialing. (17-19)

Attendant notification.

- Although all equipment should be capable of attendant notification, if state privacy law so demands, users should be able to turn off this feature. (19)

PBX owner's obligation to update LEC.

- The rules should not apply to the PBX owners' management of data, but should require that any provider of E911 service provide the database in a NENA standard format. (20)

Need for standard data link interface.

- Technical specifications should be crafted so as to avoid stifling technical innovation. Therefore, the FCC should build on existing industry specifications (e.g. those written by Bellcore and TIA). (15-16)
- The PBX/E911 network data transfer standard should be as described in the Bellcore TSSG documents. (22)
- The information in the ALI database of the location of PBX stations should be stored in a format described in various NENA documents. (22-23)
- The FCC should not define the method of data transfer between the PBX owner and the database provider, nor should it regulate methods of database accuracy, integrity, or security, but

rather should leave these tasks to local authorities. (23-24)

P.01 grade of service.

- A grade of service standard should be set at one busy call per 100 911 call attempts in the average busy hour, and the FCC should require two E911 trunks per point of presence. (39)

Labelling of non-compliant equipment.

- Equipment sold prior to the implementation date of these rules should be labelled as non-compliant. (19, 29)

Definition of emergency service location.

- Because some facilities utilizing PBXs are easily accessible by emergency personnel, it should be left to states and localities to determine whether PBXs must provide E911 access. However, all PBX equipment should have full E911 capabilities in order to allow for future expansion. (13-15)

**Wireless-Related Issues:**

General.

- Because of the vast number of people who now utilize wireless communications devices and expect these devices to act as effectively as wireline devices in summoning help, wireless E911 is imperative. (30-32, 35)
- The following is a prioritized list of PSAP service requirements: (37-38)
  - Emergency services can be reached.
  - 911 call priority.
  - Identify caller's initial location.
  - Subscriber identity information.
  - 911 call related information.
  - Updated caller location information.
  - Ability to determine type of services needed.

- Receive 911 calls at appropriate PSAP.
- Originate 911 calls from current serving system.
- Ability to communicate with TTY devices.
- Ability to keep line open after caller disconnect.
- Ability to call back disconnected caller.
- Ability to transfer call to appropriate PSAP.
- Ability to provide ALI to another PSAP.
- Ability of PSAP to force disconnect for MS to PSAP calls.
- Area cell congestion control.
- System congestion control.
- Authorization override.

Scope of requirement (covered and excluded services).

- In order to avoid burdening PSAPs with non-voice communications, non-voice services should not be allowed access to E911 services. (33-34)
- Any new or developing service should be required to provide E911 access as a condition of licensing. (38, 50-51)
- All telephone networks should be required to provide E911 access. (54)

Availability of 911 to service-initialized handsets.

- Recognizes that handsets must be service initialized in order to provide 911 service. (36)
- Because today's wireless subscribers are extremely mobile, wireless 911 service should be available to all service initialized users and subscribed-to roamers within one year of the effective date of these rules. (38-39)

Need to press SEND.

- Recognizes that pressing SEND is required on most mobile handsets. (36)

911 call priority.

- Supports requiring 911 call priority and maintains that one manufacturer's equipment already provides this capability. (39-40)

Provision of location information.

- Supports timelines of 1 year for cell site information, 3 years for directional information, and 5 years for 3 dimensional information. However, would require that the final required resolution be increased to a 10 meter sphere. (40-43)

Re-ring/call-back.

- Because of its importance in saving lives, call-back should be required, except where the mobile unit has been turned off. At minimum, mobile carriers should be required to provide the caller's 10 digit number and roamer access port (if applicable) to the PSAP. (43-45)

Common channel signalling.

- Supports requiring a common channel standard which would provide call-back number, ALI, class of service and PSAP routing. Suggests that an expanded SS7 would best meet these requirements. (45-49)

Access to TTY devices.

- Supports TTY access requirements. (49-50)

Labelling.

- Supports labelling requirement and would extend it by requiring manufacturers to supply labels to vendors to place on already installed equipment. (51)

**Other Issues:**

Preemption.

- To the limited extent necessary to assure uniform, nationwide access to E911 services, these rules should preempt state law. (52, 54)

Privacy.

- The FCC should require that service providers transmit all relevant information to the E911 interface, at which point local law will determine whether the information can be displayed. (52)
- Wireless service providers must be required to provide user information to the manager of the ALI database, regardless of competitive concerns. (53)

**AT&T CORP.**

**Interest:** Service provider

**PBX-Related Issues:**

Ability of PBX to pass calling number and location

- The Commission should require operators of MLTS to ensure that systems outpulse to the LEC a number to be denominate the CESID. The CESID could be shared by telephones in the same emergency response location. The LEC would be responsible for maintaining a data base of locations for each CESID. (6-7)
- The Commission should not require that any particular piece of equipment outpulse the CESID as this will impose costs on some users without benefits. (7-8)

Timing of compliance

- Because requirements regarding the capabilities of dispersed private telephone systems should not have to be met by any particular piece of equipment, the proposed dates are inapposite. (13)
- The required compliance date for dispersed private telephone systems should tie-in to the compliance date for data base and video display matters. Three years from the effective date of the new rules seems reasonable. (13-14)

Definition of emergency service location

- Emergency service location should be defined as "an area of a size and configuration permitting an emergency response team dispatched to that area to locate the caller quickly." (6)

Reach 911 without initial "9"

- The Commission should require MLTS equipment installed after a certain date (suggests three years after the effective date of rules) to have the capability to reach emergency services by dialling 911. PBX equipment domestically manufactured or imported prior to the implementation date should not be labeled with a warning label as this will create confusion and will not provide useful information. (10-11)

#### Attendant Notification

- PBX systems should have the capability to alert an attendant. The Commission should clarify that the notification requirement does not mean that the attendant must be bridged on to 911 calls, particularly when state or local regulations prohibit it. (11-12)

#### PBX owner's obligation to update LEC

- The rules should specify responsibilities for timely and accurate data base maintenance. Specifying a uniform standard for the format governing the display of information on the PSAP attendant's screen is essential and uniformity will make it easier to implement new applications. Supports mandatory compliance with the NENA standard as a requirement applicable between the data base and the PSAP. In order to address these data-base related topics, a new rule part is needed. (12-13)

#### Training of PBX-owner personnel

- Mandating that proper functioning of equipment be verified by installation supervisors with specified qualifications is sensible for additions to the data base, but is unnecessary in the case of deletions. (14-15)

#### P.01 grade of service

- The P-0.01 requirement is excessive given the low usage of these trunks. The operator, LEC, and PSAP provider should have the ability to agree on the needed facilities. (15)

#### Other

- The definition of Enhanced 911 Calling, Selective Routing, Public Safety Answering Point, and Multi-Line Telecommunications should be modified. (4-5)
- To the extent technically feasible, the FCC should treat the in-building base station antennas through which wireless PBX terminals access the MLTS as if they were wired telephones. (9-10)
- Proposed rule section 68.106(f) regarding the information the customer must supply to the LEC ignores the important role of public safety



agencies in determining the required information.  
(14)

- The technical standards in proposed section 68.320(b) should not specify MF signalling because that would deny manufacturers the opportunity to take advantage of new signalling technology. (15)

## **Wireless-Related Issues**

### Scope of requirement

- All providers of real-time voice CMRS services, except air-to-ground service, should be required to provide access to 911 and services should be equivalent to those accessible by landline customers. However, the equivalent access requirement must be tempered with a recognition of the problems unique to the wireless environment. (20-21)
- Within one year from the effective date of the Order, any mobile radio transmitter that is service initialized on a radio network must be allowed to make a 911 call. (21-22)

### Availability of 911 to service-initialized handsets.

- The Commission should clarify whether it intends to require that locked phones transmit 911 calls. Retro-fitting of any non-compliant existing handsets should not be required. (25)

### Need to press SEND

- The Commission should clarify that mobile customers may reach 911 by dialing 911 plus the SEND key. (24-25)

### 911 call priority

- Priority access should not begin at the handset as this would require massive retro-fitting. (26)
- It may be inappropriate in the mobile context to assume that every mobile-originated 911 call should enjoy priority. Because mobile 911 calls often come in clusters and numerous people report the same event, priority access would aggravate congestion and prevent high-priority calls made from accessing the network. This would raise